

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SARAH PALIN, an individual,

Plaintiff,

– against –

THE NEW YORK TIMES COMPANY,  
A New York corporation

Defendants .

No. 17 Civ. 4853

Hon. Jed S. Rakoff

ECF Case

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that upon the annexed Memorandum of Law and Declaration of Shane B. Vogt, Esq. (and the exhibits thereto), Plaintiff, Sarah Palin, will move this Court before the Honorable Jed. S. Rakoff, United States District Judge for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 14B, New York 10007, at a date and time to be designated by this Court, for an Order pursuant to Fed. R. Civ. Proc. 59(e) and Local Rule 6.3, for reconsideration of the Court's August 29, 2017 Order dismissing Plaintiff's Complaint *with prejudice* and to alter or amend the Court's August 30, 2017 Judgment.

PLEASE TAKE FURTHER NOTICE THAT, pursuant to the conference held on September 11, 2017, defendant shall file its response on or before October 9, 2017, and plaintiff shall file her reply, if any, on or before October 16, 2017.

Dated: September 25, 2017

/s/ *Shane B. Vogt*

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Notice of Motion was filed electronically on the 25th day of September 2017. Notice of this filing will be sent by operation of the Court's electronic filing system to counsel of record for all parties as indicated on the electronic filing receipt. Parties and their counsel may access this filing through the Court's system.

/s/ Shane B. Vogt  
Attorney